



DEPARTMENT OF THE NAVY
NAVAL SERVICE TRAINING COMMAND
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CNSTCINST 5100.1
N315
16 Aug 06

COMNAVSERVTRACOM INSTRUCTION 5100.1

Subj: NAVAL SERVICE TRAINING COMMAND (NSTC) OCCUPATIONAL SAFETY AND HEALTH AND HIGH-RISK TRAINING SAFETY POLICIES AND PROCEDURES

Ref: (a) OPNAVINST 5100.23G
(b) OPNAVINST 1500.75A
(c) OPNAVINST 5102.1D
(d) OPNAVINST 3500.39B
(e) OPNAVINST 6110.1H
(f) OPNAVINST 5100.12G
(g) OPNAVINST 5100.25A
(h) NETCINST 5100.1
(i) NAVEDTRA 135B
(j) NAVEDTRA 10500 (CANTRAC)
(k) NETCINST 4790.3
(l) CNSTCINST 3541.1

Encl: (1) NSTC High-Risk Courses
(2) Occupational Safety and Health Program Implementation Procedures
(3) High-Risk Training Safety Program Implementation Procedures

1. Purpose. Establishes procedures for implementing and administering NSTC's Navy Occupational Safety and Health (NAVOSH) Program, Training Safety Program, per references (a) through (l). This instruction consolidates safety program requirements and standardizes the implementation process for the entire NSTC domain.

2. Background. Aggressive training programs designed to prepare military personnel to perform professionally in normal as well as potentially hazardous evolutions entail elements of risk. A fatal or serious mishap might occur in any environment; however, some evolutions are more likely to result in serious mishaps than others and require procedures specially designed to reduce risk. NSTC is required by references (a), (b) and (h) to ensure training is conducted as safely as possible, while meeting required course objectives.

3. Policy. It is the policy of NSTC to provide a safe, healthful workplace and training environment and to ensure safety is integral to all elements of the NSTC mission including high-risk training. Safety initiatives shall be maintained at a level that facilitates safe but realistic training that fulfills Fleet operational requirements within practical limits. This policy is

not intended to eliminate risk where it is necessary to meet valid training objectives, but to promote the safest training that produces confident, capable Fleet personnel. Injuries and property damage are costly, and in most cases avoidable. Mishaps result in loss of operational readiness, pain and personal hardship to the people involved. There is no task so urgent or so important that it must be accomplished at the expense of safe work practices and working conditions. Per reference (d), Operational Risk Management shall be used to continuously evaluate procedures, processes and practices to determine risk factors. The success of our safety program is dependent upon the joint efforts of all NSTC personnel.

4. Scope and Applicability. This instruction is applicable to all activities within NSTC and to all civilian, military and foreign national personnel assigned to NSTC activities at all levels. While the training safety requirements contained in this instruction primarily apply to high-risk courses, some elements such as Training Time Out procedures, annual safety stand downs and Emergency Action Plans will be incorporated in all courses as applicable.

5. Definitions

a. Base Operating Support (BOS) Safety. Compliance with NAVOSH, Marine Corps Occupational Safety and Health (OSH), Traffic Safety, Recreational and Off-Duty Safety (RODS) and Explosive Safety programs.

b. Drop on Request (DOR). Students in a voluntary high-risk training course that desire to quit or DOR need only to make such intentions known. A written summary of action taken is entered in the student's service record and a copy is maintained in the command's permanent records.

c. Emergency Action Plan (EAP). (Formerly called a Pre-Mishap Plan). A plan to be implemented in case of a mishap. This plan will be developed for all training evolutions and shall include as a minimum:

(1) Emergency numbers (telephone and radio channel or call signs); and

(2) Locations of emergency response personnel, locations of emergency equipment, equipment shutdown procedures, backup communication circuit identification, muster site and methods to maintain control of the non-affected students and procedures to be followed in the event of a mishap.

d. **Federal Occupational Safety and Health Administration (OSHA) Official**. Investigator or compliance officer employed by, assigned to or under contract to OSHA.

e. **Formal Training**. Training conducted in a classroom, laboratory or field exercise for which a Course Identification Number (CIN) is assigned.

f. **Hazard**. A condition that might result in injury, health impairment, illness, disease or death to anyone who is exposed to the condition, or damage and loss to property or equipment.

g. **High-Risk Training**. Basic or advanced individual or collective training (traditional, non-traditional, or unit level) that exposes students and instructors to the risk of death or permanent disability as defined per reference (b).

h. **High-Risk Training Safety Review**. A comprehensive review of high-risk training conducted by the Training Safety Officer, and as appropriate, medical personnel to ensure courses are being taught with minimum risk to instructors and students. Safety reviews include near miss and mishap data, curriculum instructional techniques, and safety requirements incorporated into course curricula. Training records, student critiques, and instructor qualifications and evaluations will be examined during a review.

i. **Injury**. Traumatic bodily harm, such as a cut, fracture, burn or poisoning caused by a single or one-day exposure to an external force, toxic substance, or physical agent.

j. **Inspection**. A comprehensive survey of all or part of a workplace in order to detect safety and health hazards as distinguished from routine day-to-day evaluation and monitoring by local OSH personnel.

k. **Mishap**. Any unplanned or unexpected event causing death, injury, occupational illness, including days away from work, job transfer or restriction and material loss or damage.

l. **Mission Safety**. Supports the Navy and Marine Corps safety programs that are unique to specific Headquarters and Echelon II missions. Headquarters and Echelon II Mission Safety is integrated into "unique and integral" mission accomplishments for which the cognizant Headquarters and Echelon II receive separate funding. All shore activities support the mission of the Navy and Marine Corps through their NAVOSH and OSH programs, regardless of funding sources. Special circumstances require the activity to request or receive services supported by headquarters mission safety programs like diving, ship and building design and

construction, aviation, medical and training. The following are identified examples of mission-related OSH functions by major claimant. These examples are not all-inclusive:

(1) Fleet commands performing OSH functions in support of ship intermediate and depot maintenance work, aircraft intermediate maintenance, operational units (including those with deployable units), construction battalions and high-risk mission training;

(2) Naval Facilities (NAVFAC) commands responsible for the global NAVFAC mission such as Base Realignment and Closure (BRAC) caretaker, Marine Corps Military Construction (MILCON) design and construction, contractor safety and environmental clean up;

(3) Bureau of Medicine and Surgery (BUMED) commands mission critical safety services are defined as Joint Commission on Accreditation of Healthcare Organizations standards for employee, patient and visitor safety;

(4) Naval Air Systems (NAVAIR) commands performing OSH functions in support of aircraft Research, Development, Test & Evaluation (RDT&E), acquisition and intermediate/depot maintenance;

(5) Naval Sea Systems (NAVSEA) commands performing OSH functions in support of ship intermediate and depot maintenance work and acquisition and contractor oversight (i.e., Supervisors of Shipbuilding (SUPSHIPS)); and

(5) Naval Education and Training Command (NETC) commands performing mission and high-risk training.

m. **Near Miss**. An act or event that might have resulted in a near mishap in which injury or damage was avoided merely by chance.

n. **Non-traditional Training**. Formal training that is conducted by private sector or military personnel at contractor owned and operated facility.

o. **Occupational Health**. The multidisciplinary field of general preventive medicine that is concerned with prevention and treatment of illness induced by factors in the workplace environment. The major disciplines involved are:

- (1) Occupational medicine;
- (2) Occupational health nursing;
- (3) Epidemiology;
- (4) Toxicology;
- (5) Audiology;
- (6) Industrial hygiene, and
- (7) Health physics.

(8) Activities that include the design, implementation and evaluation of comprehensive health and safety programs that promote employee health and safety in the workplace.

p. **Occupational Illness**. A physiological harm or loss of capacity caused by systemic infection; continued or repeated stress or strain; exposure to toxins, poisons, fumes, etc.; or other continued and repeated exposures to conditions of the work environment over a long period of time. For practical purposes, an occupational illness or disease is any condition not meeting the definition of occupational injury.

q. **Occupational Injury**. Any injury, such as a cut, fracture, sprain, amputation that results from a work accident or from an exposure involving a single incident in the work environment.

r. **OSHA**. Occupational Safety and Health Administration, Department of Labor (DOL).

s. **OSHA Standards**. OSHA standards are those standards issued by the DOL's Occupational Safety and Health Administration under Section 6 of the OSHA Act.

t. **OSH Professional**. OSH professionals are those personnel that have been formally trained through courses of instruction, laboratory experience and field study to perform the necessary technical monitoring, consulting, testing, inspecting and other tasks that are required of OSH duties.

u. **Traditional Training**. Formal training conducted by naval personnel or contractors at a Navy owned and operated facility.

v. **Training Mishap**. Any mishap that occurs while conducting formal, traditional, non-traditional or unit level training as a result of the curriculum or the environment (including training devices).

w. **Training Safety Officer (TSO)**. An individual designated in writing by the training activity's Commanding Officer (CO) to oversee high-risk courses.

x. **Training Time Out (TTO)**. In any situation when students or instructors express concern for personal safety or a need to clarify procedures or requirements, they shall call a "TTO". Training will immediately cease until the situation or condition is returned to a safe state. Then and only then will training resume.

y. **Unsafe or Unhealthful Working Conditions**. A condition which might, if allowed to go unchecked or uncorrected, has the potential to cause a mishap.

z. **Voluntary Training**. Training which is high-risk in nature and is agreed upon by the resource sponsor and Curriculum Control Authority (CCA) as voluntary and identified by a Special Course Indicator Code (SCIC) of "A" or "D" in the Corporate Enterprise Training Activity Resource System (CETARS).

6. **Implementation Responsibilities**. The safety and health of personnel are inherent responsibilities of each command. Direction and control of the safety and health program must be via the chain of command, with line managers and supervisors being primarily responsible. The responsibility of the regional or host safety office is to provide BOS services, administration, coordination, advice and recommendations to line managers and supervisors. NSTC activities receiving BOS safety support from a regional or host safety office shall provide a copy of this instruction to the regional or host safety manager or site safety office that provides the support.

a. **NSTC** shall:

(1) Provide technical guidance and procedures to activities in implementing a viable OSH and Training Safety Program;

(2) Develop and implement an OSH program self-assessment for activities that meet the requirements per reference (a);

(3) Develop and implement a training safety self-assessment for activities conducting high-risk training that evaluates the effectiveness of instructor certification programs; safety controls; inspection of training sites; devices and equipment; student fitness procedures; EAPs; and compliance per references (b) and (h).

(4) Ensure all activities are provided sufficient support to implement requirements of references (a) through (l). Support for the implementation of BOS safety services should be obtained through the use of a Memorandum of Agreement (MOA) or Intra-Service and Intergovernmental Support Agreement (ISSA) with the regional or host safety office. MOAs and ISSAs must clearly define BOS safety services as outlined in reference (h), enclosure (1). Notify NETC Safety (N00X) of all statements of denial of BOS safety services that the regional or host safety office will not provide;

(5) Ensure triennial oversight evaluations are conducted and the evaluation assesses the effectiveness and compliance of OSH and Training Safety Programs. Additionally, provide a Consolidated Deficiency Report to N00X no later than (NLT) 31 October of each year. **(Note: NSTC may observe training at any command with short or no notice and may conduct a full safety review following any class A or B mishap or as directed by higher authority.)**

(6) Assess the risk level of courses under development or newly nominated as high-risk courses;

(7) Designate courses as high-risk based on an in-depth risk assessment and maintain enclosure (1) of this instruction;

(8) In addition to duties specified by references (a), (b), and (h), ensure activities comply with this instruction;

(9) Promulgate and distribute a schedule of Annual Occupational Safety and Health Evaluations, Training Safety Evaluations and Firefighter Trainer Certification Surveys NLT 1 August of each year; and

(10) Endorse and forward all Activity and Individual Safety Award nomination packages (as outlined in references (a) and (h)) to N00X NLT 31 December of each year, unless otherwise directed.

b. Curricula Control Authorities (CCA) shall:

(1) Ensure safety requirements of references (a) through (l), Personnel Qualification Standards (PQS), Preventive Maintenance Standards (PMS), technical manuals, Operational Risk Management, and other source documents are incorporated in curricula.

(2) Standardize curricula, including safety procedures, when courses are taught at more than one site.

(3) Recommend changes to enclosure (1) whenever courses are developed, modified or discontinued where elements of risk are introduced or removed.

c. Course Curriculum Model Managers (CCMM) shall:

(1) Include DOR procedures in all high-risk voluntary courses and properly explain DOR prior to training;

(2) Include TTO procedures in all curricula where appropriate. Add evolution-specific TTO procedures, if feasible, to conform to established Fleet distress indicators (e.g., standard small arms range procedures or diving distress signals);

(3) Include the definitions of mishap, near miss, and unsafe conditions in all curricula;

(4) Include lessons learned and safety precautions mandated by safety directives and prior experience in all curricula;

(5) Identify course prerequisites that reflect physical, academic, and performance standards required for successful completion of courses. Include these standards and the requirement for parent commands to pre-screen students in the CANTRAC;

(6) Delete all high-risk evolutions not essential to training objectives or are not required for graduation;

(7) Update curricula as necessary to ensure compliance with controlling technical directives;

(8) Approve course schedule variations and sequencing of evolutions for participating activities;

(9) Recommend, via CCA, changes to enclosure (1) whenever high-risk courses are developed, modified, discontinued, reevaluated or elements of risk are introduced into courses not previously listed.

d. NSTC activities shall:

(1) Implement and maintain an aggressive safety and occupational health program per reference (a) and Program Implementation Guidance provided per enclosure (2).

(2) Implement and maintain a robust off-duty safety program for all military personnel that includes initiatives to prevent off-duty recreational and motor vehicle mishaps per references (f) and (g);

(3) Implement and maintain a viable Training Safety Program as applicable per guidance provided in references (b), (h) and enclosure (3) of this instruction.

(4) Recommend, via the CCMM and CCA, changes to enclosure (1) whenever high-risk courses are developed, modified, discontinued, reevaluated, or elements of risk are introduced into courses not previously listed;

(5) Personally involve themselves in training to ensure that appropriate safety precautions are in place and functional;

(6) Conduct high-risk training safety reviews on an annual basis;

(7) Complete a Safety Review Checklist on all courses at least annually utilizing the checklist provided in reference (i);

(8) Consider requesting a Training Safety Survey (assist visit) from the Naval Safety Center Training Safety Division (Code 48) in mid inspection cycle (18 months before or after NSTC Training Safety Evaluation);

(9) Establish and implement a DOR policy for all voluntary high-risk courses;

(10) Establish and implement a TTO policy and procedure for all high-risk training evolutions;

(11) Establish and implement a student indoctrination process during the introductory phase of all courses prior to start of training;

(12) Conduct training in accordance with approved curricula;

(13) Ensure the required number of instructors and safety observers (per curricula) are present whenever training is conducted. Assign additional instructors and safety observers as warranted by the nature of the evolution and risk assessment;

(14) Designate (in writing) a full time TSO for oversight of each high-risk course or group of courses;

(15) Ensure all training-related first aid, medical treatment, and lost-time injury incidents are logged, investigated, and reported per references (a) and (c);

(16) Analyze mishap statistics for all formal training courses. Review student mishap statistics quarterly and ensure courses with statistical irregularities and adverse trends are evaluated for possible improvements. Develop and recommend modifications to curricula to remove or mitigate risks not essential to course objectives;

(17) Ensure training equipment and facilities are inspected periodically per reference (a);

(18) Ensure that a Planned Maintenance System (PMS) and spot-check program is in place for all training equipment, devices and Personal Protective equipment (PPE) per reference (k);

(19) Ensure EAPs are developed, coordinated with host commands, updated monthly, walked-through quarterly, and exercised at least annually for all training evolutions;

(20) Ensure secondary means of communication, e.g., cellular telephone or Very High Frequency (VHF) radio is available for use at all high-risk and remote training sights in the event landline communication fails;

(21) Develop and implement a High-Risk Instructor Certification Program;

(22) Ensure student physical qualification requirements are completed prior to commencement of high-risk training;

(23) Establish procedures with the local medical facility to ensure when students are evaluated or treated the medical facility will provide supervisors or instructors with a clear indication of student fitness for training. Do not rely solely on students to inform instructors of changes in medical status. Students evaluated as unfit or unsuited shall be removed from training immediately until medically cleared;

(24) Establish procedures to ensure instructors are informed concerning students who were previously "set back" due to medical conditions that might cause future problems;

(25) Analyze student critique information to identify potential safety problems utilizing student critique forms provided in reference (i);

(26) If applicable, ensure firefighter training and platforms are in compliance with reference (l);

(27) Ensure that emergency oxygen is available on scene during all aquatic and firefighter training. **(NOTE: A corpsman, paramedic, Emergency Medical Technician (EMT), or other person qualified to administer supplemental oxygen shall be present during these evolutions.)**

f. TSO shall:

(1) Complete a qualification process that includes a familiarization with all applicable references, instructions, and subject matter doctrine;

(2) Be familiar with high-risk training objectives and evolutions including approved training procedures, safety precautions, emergency procedures, training facilities and equipment and DOR and TTO procedures.

(3) Observe high-risk training evolutions and assess compliance with approved training procedures, safety precautions and emergency procedures. Document and report observation results and recommendations to the CO or Officer-in-Charge (OIC). Frequency of observation shall be determined by the CO or OIC based on course frequency and nature of training;

(4) Ensure all training mishaps, near misses and injuries are logged and reported per reference (c);

(5) Maintain a record of all mishaps for additional analysis from the TSO point of view in addition to records maintained by the command, regional or host safety office;

(6) In conjunction with the command safety officer, keep the CO or OIC advised of all training mishap and injury investigation results and recommended corrective action;

(7) Monitor the training safety program to ensure that the CO's responsibilities in reference (i) are being properly executed;

(8) Assist (as necessary) the Occupational Safety and Health Office (or Echelon II or III Mishap Investigation Team) in conducting investigations of training mishaps.

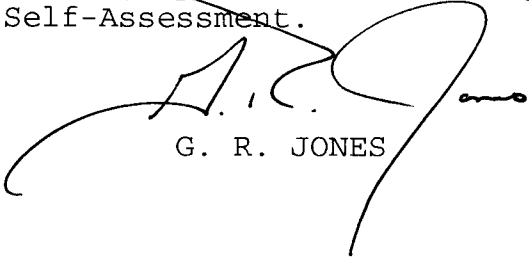
7. Disenrollment or Interruption of Training. There are various ways for NSTC students to attrite. For the purposes of this instruction only DOR based on personal concern or apprehension for physical safety and TTO are addressed.

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8. Reports. The following reports are recurring and are required by this instruction:

a. NETCINST 5100.1A Paragraph 13(a.), Projected NAVOSH Training Needs Assessment.

b. NETCINST 5100.1A Paragraph 13(c.), OSH Program and Training Safety Annual Self-Assessment.



G. R. JONES

NSTC HIGH RISK COURSES

<u>CIN #</u> NO CIN#	<u>COURSE LONG TITLE</u>	<u>AT-RISK EVENT</u>	<u>EVENT SUBSET</u>	<u>LOCATION</u>
	NAVAL RESERVE OFFICER TRAINING CORPS	PHYSICAL READINESS TRAINING MARKSMANSHIP SWIMMING SAILING		VARIOUS
A-950-0001	RECRUIT BASIC MILITARY TRAINING	PHYSICAL READINESS TRAINING MARKSMANSHIP SWIMMING FIREFIGHTING BATTLESTATIONS	<ul style="list-style-type: none"> > GENERAL QUARTERS > BATTLE TRANSIT > INVESTIGATE & RESCUE > STORES ONLOAD > MASS CASUALTY > MAGAZINE FLOODING > FORRESTAL ESCAPE SCUTTLE > ROVING SECURITY > SHIPBOARD OPERATIONS > EMERGENCY SORTIE > MASS CONFLAGRATION 	GREAT LAKES, IL
P-9E-4302	OFFICER INDOCTRINATION SCHOOL	PHYSICAL READINESS TRAINING MARKSMANSHIP FIREFIGHTING BATTLESTATIONS	<ul style="list-style-type: none"> > MASS CASUALTY > WATER SURVIVAL > BUTTERCUP > TEAM CHALLENGE > FIREFIGHTING 	NEWPORT, RI
P-5G-4301	NAVY CHAPLAIN BASIC COURSE	PHYSICAL CONDITIONING		
V-5G-0002	AMPHIB/EXPEDITIONARY CHAPLAIN COURSE	PHYSICAL READINESS TRAINING		
P-911-0001	SEAMAN TO ADMIRAL - 21 (NSI)	PHYSICAL READINESS TRAINING		
P-911-0002	SEAMAN TO ADMIRAL - 21 BOOST (3 MOS.)	PHYSICAL READINESS TRAINING		
P-911-0003	SEAMAN TO ADMIRAL - 21 BOOST (6 MOS.)	PHYSICAL READINESS TRAINING		
P-911-0004	SEAMAN TO ADMIRAL - 21 BOOST (9 MOS.)	PHYSICAL READINESS TRAINING		
P-911-0005	SEAMAN TO ADMIRAL - 21 BOOST (NSI FOLL	PHYSICAL READINESS TRAINING		

<u>CIN #</u>	<u>COURSE LONG TITLE</u>	<u>AT-RISK EVENT</u>	<u>EVENT SUBSET</u>	<u>LOCATION</u>
P-9B-2000	OFFICER CANDIDATE SCHOOL	PHYSICAL READINESS TRAINING		PENSACOLA, FL
Q-9B-0023	LIMITED DUTY/CHIEF WARRANT OFFICER INDOC	PHYSICAL READINESS TRAINING		
Q-9B-0024	DIRECT COMMISSION OFFICER INDOC	BATTLESTATIONS	> SPACE BRIDGE > MINE FIELD > BRIDGE OVER TROUBLED WATER > GEORGE'S GORGE > DOUBLE TROUBLE > THE BATH > PIRANHA BATH > RIVER CRY > IMPOSSIBLE DREAM > PINE MATTERHORN > SWINGING BRIDGE > ESCAPE GATE > THE SHAFT > TARZAN'S TANGLE > BLOWN BRIDGE > WALLED IN > BACON'S BATTLE	

OCCUPATIONAL SAFETY AND HEALTH PROGRAM IMPLEMENTATION PROCEDURES

1. Action. All levels of command are responsible for implementing and maintaining an aggressive safety and occupational health program.

2. Organization. Duties and responsibilities of the NSTC Safety Office shall be assigned per reference (a).

a. NSTC Headquarters will maintain sufficient staff members that meet qualification criteria as outlined in reference (a) to serve as technical advisor(s) to NSTC and activities on matters of safety and occupational health and implementation of higher headquarters directives and requirements.

b. All NSTC activities shall obtain OSH services through the regional and host safety office. A collateral duty safety billet or OSH professional must be identified to coordinate safety support with the regional or host safety offices. Activities will ensure services to be provided are clearly defined in a local MOA or ISSA.

3. Training

a. NSTC activities shall ensure all personnel attend safety and occupational health training provided by the regional or host safety office appropriate for the level of work performed. Safety and occupational health training shall meet minimum requirements outlined in reference (a). As a minimum, all personnel shall receive safety indoctrination upon arrival at a NSTC activity and all civilian supervisors and military personnel, E-5 and above, shall receive NAVOSH training for supervisors within 90 days of their assignment.

b. NSTC activities shall submit a list of projected formal NAVOSH training requirements (training needs assessment) for the following fiscal year to NSTC N315 via the chain of command. NSTC will advise activities of the reporting date for the training needs assessment each year. **(NOTE: This listing is for determination of training needs and training locations for out-years and is not the format for requesting quotas or funding).**

4. Councils and Committees. NSTC activities will actively participate in regional or host safety councils, tenant activity meetings, etc.

5. Lockout/Tag-out of Energy Sources. Energy control requirements contained in reference (a) shall be applied to operational tasks that do not involve formal, supervised instruction. Elements of the afloat energy control program that clearly violate OSHA requirements (i.e., Red Tags) may not be used as part of an ashore energy control program.

6. Hazardous Material Control & Management (HMC&M)

a. NSTC activities that handle, use, store or dispose of hazardous materials (HM) shall fully participate in the applicable host's or supporting command's HMC&M program. HMC&M program requirements are contained in reference (a). NSTC activities shall be active participants in the host or supporting command's Hazardous Material Minimization (HAZMIN) Center and comply with the host or supporting command's HMC&M instructions.

b. Activities shall implement up-front controls to ensure materials procured, stocked and used are the least hazardous materials available to accomplish the task. Government credit cards shall not be used to purchase (HM) without specific authorization. Such approval shall not be granted unless a stock numbered product is not readily available through the supply system and there is a valid controlling document (e.g. maintenance requirement card, maintenance requirement plan, tech manual, etc.) for the material. The activity shall be familiar with and comply with base written procedures for approval of HM purchases.

c. HM shall not be used until the PPE specific to the hazardous material has been identified in the PPE Hazard Assessment required by OSHA standards and reference (a). Personnel shall be instructed in the use, care and maintenance of such PPE.

7. NAVOSH Inspections and Surveys. Reference (a) establishes the NAVOSH inspection program.

a. NSTC will conduct Occupational Safety and Health Program Management Evaluations (OSHME) at least once every 3 years (minimum). OSHMEs will be consolidated with training safety evaluations to the greatest extent possible. Evaluations may be scheduled or unannounced. If scheduled, written notice will be provided to the activity to be evaluated at least 30 days prior to the evaluation. To facilitate a productive evaluation, NSTC will also request specific documentation from the activity prior to the visit. The scope and depth of the evaluation will be based on the results of the review of program documentation, e.g., self-assessment, mishap trends, past OSHMEs.

b. Deficiencies identified during workplace, fire prevention and explosive safety inspections shall be posted and monitored until completely abated.

c. The Naval Inspector General (NAVINSGEN) conducts oversight inspections, primarily of bases and large activities. In the event a NSTC activity is included in a NAVINSGEN inspection, results of these inspections shall be reported to NSTC N315 by phone immediately following the NAVINSGEN debriefing. Implementation status reports submitted as a result of these inspections shall be forwarded via the chain of command for endorsement.

d. DOL OSHA announced or unannounced inspections of Department of Defense (DoD) workplaces employing civilians may be conducted in response to employee (or employee representative) complaints or may be conducted at the discretion of the Secretary of Labor. Copies of all written correspondence and inspection reports related to any OSHA inspection or investigation shall be provided to NSTC N315, who will in turn forward to N00X via the chain of command. NSTC N315 shall be notified immediately, by phone, upon arrival of any OSHA officials for the purpose of inspection or review of NSTC activities.

e. Responses to Weight Handling Equipment audits, NAVFAC Fire Protection Surveys, Explosive Safety Inspections and similar types of inspections or evaluations shall be routed via NSTC for concurrence and endorsement.

f. Workplace inspections shall be conducted per reference (a) paragraph 0903.a. by the regional or host safety office. At a minimum, they shall include a review of the following:

(1) All programs applicable to the specific workplace (i.e., program implemented, processes in place to ensure compliance, etc.);

(2) A thorough workplace musculoskeletal disorders analysis as identified in reference (a) paragraph 2304;

(3) A review of the work practices or standard operating procedures applicable to the workplace for unsafe factors and conditions;

(4) A comparative review of all hazardous materials used and what is listed on the Authorized Use List (AUL). Verification that use and storage are in compliance with applicable activity instructions as well as reference (a);

(5) Verification of OSH training completion by supervisors and workers;

(6) PPE use, maintenance, storage and PPE workplace hazard assessments reference (a); and

(7) A workplace evaluation to identify violations of standards.

8. Mishap Reporting and Investigation

a. All NSTC personnel shall immediately report to their supervisor any occupational injury or illness they may experience in accordance with references (a) and (c) and locally established procedures. Military personnel are required to report both on and off duty injuries.

b. All NSTC activities shall conduct a detailed analysis of their mishap experiences and develop calendar year mishap reduction goals. Activities may obtain mishap data from the regional or host safety office as necessary to conduct this analysis.

9. Workplace Hazards

a. It is the responsibility of all personnel to immediately report any unsafe or unhealthful working conditions. Since many safety and health problems can be eliminated as soon as they are identified, personnel are encouraged to orally report unsafe or unhealthful working conditions to their immediate supervisor who shall immediately investigate the situation and take appropriate corrective action. Supervisors should contact the regional or host safety office for assistance as necessary.

b. Personnel may also report unsafe and unhealthful working conditions in writing per reference (a) and locally established procedures.

10. Special Emphasis Programs

a. Safety Program Goals and Objectives. In accordance with references (a) and (h), NSTC activities shall conduct an annual OSH Program and Training Safety Self-Assessment. Each activity shall forward a copy of the most recent OSH Program and Training Safety Self-Assessment to NSTC NLT 1 February of each year, via the chain of command. The format for the self-assessment will be provided by NSTC.

b. Safety Awards. All NSTC activities are strongly encouraged to actively participate in the NETC Safety Awards Program outlined in references (a) and (h).

c. Self-Help Programs. Activities shall ensure that all self-help projects are reviewed by the regional or host OSH office and the host fire department prior to the start of work. This includes self-help projects using students unless a Standard Operating Procedure (SOP) has been established for the work process and the SOP is reviewed and approved at least annually by the OSH office and fire department.

HIGH-RISK TRAINING PROGRAM IMPLEMENTATION PROCEDURES

1. Annual Course Safety Reviews. Reviews shall be conducted by training and safety personnel with participation by medical personnel to ensure courses are being conducted with minimum risk to students and instructors. Reviews shall be conducted at least annually on high-risk courses. Additional reviews shall be conducted following mishaps, near misses or major course revisions or equipment modifications (these may focus on the specific topics involved and may be shorter in duration than annual stand downs). Reviews shall be documented and include the following:

- a. Curricula being taught;
- b. Instructional techniques;
- c. Training environments;
- d. Availability and use of mechanical guards, including clearly placarded, accessible cut-off switches to secure power to training equipment;
- e. Physical and psychological screening procedures (of instructors and students);
- f. Safety related findings of the latest technical audits, Formal Course Reviews (FCR) and Course Safety Reviews;
- g. Adequacy of staffing, manning and equipment;
- h. In-service training including safety lessons learned, mishap summaries and other safety-related messages and reports; and
- i. Safety standdowns will be normally one day in duration and require preparation. Coordination within the command and active involvement by senior leaders has proven to be most effective.

2. DOR. Ensure all students are briefed on DOR policy and procedures in voluntary high-risk courses in accordance with below guidance. This briefing shall be given prior to commencing the course (i.e., course indoctrination, welcome aboard brief, etc.) and should not be repeated unless there is a long break in the course (e.g., Christmas holidays).

a. Policy. In all cases where a student states a desire to DOR from voluntary training based on concern for personal well-being, appropriate action shall be initiated, including removal

from training, referral of the student for medical, counseling, or remedial action as appropriate and review of the training environment, including training techniques. The scope and depth of these actions shall be determined by the nature of the complaint and the risk incurred in the training. A written summary of actions taken shall be made a permanent entry to the student's service record. In no case shall a student be coerced or threatened to induce him or her to return to training following a DOR.

b. Procedures. After removal from voluntary training, the student shall submit a written request detailing the reasons for DOR. The request should clearly indicate that the student wants to DOR (e.g., I, (name), desire to be removed from training in XYZ course for the following reason(s): XXX). NAVPERS 1336/3 (Rev. 5-96), Special Request or Authorization form may be used. The request shall be submitted directly to the training or division officer and shall become a part of the student's training record. If a student was being processed for an Academic Review Board (ARB) action prior to the DOR, the ARB shall take precedence. In any case, the student shall be removed from training.

c. Training or Division Officer's Interview. The loss of an able student from training or the continuation in training of a student who is unlikely to complete the program represents a waste of valuable resources, assets, time and effort. Often, students who DOR do not give the real or complete reasons for their requests. The interviewer, using no overt or implied coercion or threats, shall make a reasonable effort to determine:

- (1) The real motivation for the request;
- (2) If the decision to DOR is the result of some training factor which may lead other students to DOR. If so, can training be changed to alleviate this factor without adversely affecting program objectives;
- (3) If the student desires to reenter the program;
- (4) If student retention is warranted, are there actions (counseling, change of instructor, or special assistance) which might cause the student not to DOR? Are such actions justified in view of the impact upon the overall training program and upon other students; and
- (5) The interview need only be detailed enough to satisfy the CO, OIC or Director of Training that student understands the gravity of DOR and the reasons for the DOR are known or that further questioning is unlikely to reveal additional information.

d. No one in the DOR chain shall refuse to forward a request or to remove the student from training, nor shall anyone delay a request in an effort to arrive at the cause of the DOR or threaten/coerce a student to reconsider.

e. Post-Interview Procedure. If, after the interview, a student still desires to DOR, the interviewer shall refer the student to the reviewing officer for further interviews or administrative action. The interviewing officer shall provide a signed, written summary of the interview and recommended actions to the reviewing officer.

f. Administrative Procedure. The administrative procedures for disposition of a DOR attrite are the same as those for a disenrollment. There is, however, no requirement for a formal ARB.

3. TTO. Instructors will ensure all students are briefed on TTO policy and procedures prior to each high-risk evolution or laboratory. For multi-day or all-day evolutions, TTO shall be re-briefed prior to the start of training following major breaks, such as meal times. Evolution-specific TTO procedures should be added where needed. These procedures should be standardized to conform with established Fleet distress indicators where appropriate (e.g., standard small arms range procedures, diving distress signals, etc.). Emphasis shall be placed on specific verbal and nonverbal signals to be used by students and instructors.

a. A TTO may be called in any training situation where a student or instructor expresses concern for personal safety or requests clarification of procedures or requirements. TTO is also an appropriate means for a student to obtain relief if he or she is experiencing pain, heat stress, or other serious physical discomfort.

b. Instructors are responsible for maintaining situational awareness and shall remain alert to signs of student panic, fear, extreme exhaustion or lack of confidence that may impair safe completion of the training exercise. Instructors shall cease training immediately when they consider such action appropriate.

c. Following a TTO, the situation shall be examined. Additional explanation and instruction shall be provided as needed to allow safe resumption of training. Once the lead instructor on scene is fully apprised of the problem, he or she shall direct all training to cease or only allow training with unaffected students to continue based on the situation.

d. If a student refuses to participate in training after being instructed, after an unsafe condition has been corrected, or uses TTO excessively to disrupt training, that student shall be removed from training and referred for further counseling or administrative processing.

4. Student Indoctrination. Student indoctrination briefings will include the following:

a. Safety requirements, precautions and safeguards incorporated in the curricula; and

b. Definitions of and procedures for reporting mishaps, near misses and unsafe conditions.

5. TSO. TSOs should be E-7 or above where feasible, but no more junior than E-6. Required training for TSOs shall be locally developed and in writing. Training shall consist of reviews of this instruction, references (a) through (l), subject matter doctrine, TSO responsibilities, TSO duties and the appropriate curricula and Core Unique Instructor Training (CUIT) guides. TSOs should be familiar with all high-risk evolutions to the extent necessary to properly evaluate them and their associated training devices.

6. EAP. EAPs shall be activated in the event of any injury, mishap or emergency. If multiple courses use the same trainer, such as a pool, one EAP may suffice for that device. All classrooms and laboratories shall have an EAP posted which covers initial emergency actions for instructors and students to follow in the event of medical emergency, fire, earthquake, etc., as applicable. If the training in those locations is not high-risk a one-page plan or flowchart will satisfy this requirement. These plans shall be coordinated with host commands and shall include as a minimum:

a. Locations, telephone numbers, and radio channels or call signs (if used) of medical, fire department, police or security, and other emergency response teams as required by the nature of the training.

b. Identifications and locations of emergency devices such as first aid kits, fire extinguishers, emergency oxygen, electrical isolation devices, and other equipment determined by the type of training and location.

c. Notification lists of personnel and the chain of command.

d. Sources of secondary (non-landline) emergency communications (for all high-risk and remote training).

e. Muster sites and evacuation routes for non-affected students and instructors.

f. Entry routes for emergency services vehicles and personnel.

7. EAP Review and Exercise

a. EAPs shall be reviewed monthly for accuracy of information (except for the months in which walk-throughs or exercises are conducted). Supervisors and instructors shall walk through high-risk training EAPs quarterly to validate procedures and verify operability, availability and applicability of emergency equipment.

b. High-risk training EAPs shall be exercised fully at least annually, including participation by appropriate local emergency personnel (base emergency services or disaster preparedness offices) to ensure that the supporting activity is aware of training locations and types of support required. Reviews, walk-throughs and exercises will be fully documented, shortfalls identified and recommended corrective actions tracked to fruition.

8. High-Risk Instructor Qualification

a. Upon receipt of an instructor nominee's orders, determine if the nominee will fill a high-risk instructor position. Coordinate with the detaching command to initiate instructor screening. Provide detailed guidance to the detaching command as to the extent of screening desired. Training activity Commanding Officers shall ensure that every instructor is properly screened prior to teaching students. The completed screening must meet the requirements of reference (b) and chapter (2) of reference (i), including psychosocial screening for high-risk instructors. Commanding Officers may conduct additional screening or decertify an instructor at any time for negative performance or behavior.

b. Service record reviews and personal interviews at the training command may be conducted by the Executive Officer, Director of Training, cognizant Department Head, or their equivalents when delegated, in writing, by the Commanding Officer. Medical record reviews shall be conducted in the presence of the candidate by competent medical authority (i.e., Flight Surgeon, Medical Officer or credentialed Physician Assistant, Nurse Practitioner (family practice) or Independent Duty Corpsman (IDC)).

c. When the screening is completed, make a service record Administrative Remark (Page 13) entry indicating that the member was screened and found suitable or unsuitable for high-risk instructor duty. Page 13 entries shall be signed by the CO or designated representative (see paragraph b.).

d. Report suitability or unsuitability to Bureau of Naval Personnel (BUPERS) (PERS 40/482) for United States Navy (USN) personnel or Naval Reserve Personnel Center (NAVRESPERSCEN) (Code 30) for United States Naval Reserve (USNR) Full Time Support (FTS) personnel per the Enlisted Transfer Manual.

e. Ensure prospective instructors, both officer and enlisted complete Journeyman Instructor Training (JIT) required by references (b) and (i) prior to teaching students. Equivalent JIT training from other services is acceptable.

f. Ensure instructor trainees attend (as students) high-risk courses for which they seek certification. This requirement is waived for "team training" courses where the addition of instructor trainees would disrupt the integrity of the team. In these cases, instructor trainees should undergo training in the same environment in non-team training courses, if possible.

g. Ensure that high-risk instructors are qualified and evaluated per high-risk instructor standards in reference (i). All high-risk instructors, officer and enlisted, will receive at least two evaluations that assess both technical knowledge of the subject matter and instructional delivery skills. After qualification requirements are met, high-risk instructors will receive unscheduled evaluations (spot checks) quarterly. Personnel conducting evaluations must receive training in the evaluation process. Master Training Specialists, subject matter experts and Instructional Systems Specialists should be used as appropriate.

h. Ensure that a sufficient number of high-risk instructors complete a recognized (American Red Cross or American Heart Association) First Aid and cardiopulmonary resuscitation (CPR) or basic life support (BLS) qualification program. All physical fitness training, swimming, water survival, rescue swimmer and at least two of the instructors present during any other high-risk evolution shall be qualified. These instructors shall maintain certification while assigned high-risk instructor duties.

i. Ensure High Risk Instructor Training Records (ITR) clearly reflect the instructor qualification process whereby the path to qualification is readily identifiable. All records documenting qualification will be signed and dated.

9. Student Physical qualification. Ensure student physical qualification requirements are completed prior to commencement of high-risk training. When formal requirements are not specified, Physical Readiness Test (PRT) risk factors screening shall be used per reference (e). Any student answering "**YES**" to any screening question shall receive a medical evaluation, counseling and clearance prior to commencing training. This shall be accomplished by the activity's medical officer or corpsman or by assistance from the local medical facility. Any situations not resolved at the activity level shall be referred to the local medical facility.